SIM GILL, Bar No. 6389
District Attorney for Salt Lake County
CLINT HEINER, Bar No. 11905
Deputy District Attorney
35 East 500 South
Salt Lake City, Utah 84111
(385) 468-7600
CHeiner@slco.org

IN THE THIRD DISTRICT COURT, SALT LAKE DEPARTMENT

IN AND FOR THE COUNTY OF SALT LAKE, STATE OF UTAH

THE STATE OF UTAH Plaintiff, vs. **NAY BLU SOE** **DOB: 03/26/2003** **3292 S 8000 W** **Magna, UT 84044** **OTN#: 67997882** **SO#: 431969** **SID#/BCI#: 234469377** **Booking#: 24028366** Defendant. MOHAMED, ABDIHAKIM DOB: 02/15/2005 Co-Defendant(s)	Screened by: HOMICIDE TEAM Assigned to: TO BE ASSIGNED **INFORMATION** DAO # 24.011174 BAIL: NO BAIL WARRANT WARRANT/RELEASE: IN JAIL PRD 06/26/2024 Case No. Co-Defendant DAO# 24.010973

The undersigned Law Enforcement Officer BRANDON L. LYNCH - Salt Lake City Police Department, Agency Case No. SL24-113488, upon a written declaration states on information and belief that the defendant, NAY BLU SOE, committed the crime(s) of:

COUNT 1
MURDER, 76-5-203, a First Degree Felony, as follows: That on or about May 26, 2024, at 1810 W FORTUNE RD, in Salt Lake County, the defendant, as a party to the offense, did intentionally or knowingly cause the death of another; intending to cause serious bodily injury to another, commit an act clearly dangerous to human life that caused the death of another; acting under circumstances evidencing a depraved indifference to human life, knowingly engage in conduct which created a

grave risk of death to another and thereby caused the death of another; engage in the commission, attempted commission, or immediate flight from the commission or attempted commission of any predicate offense, Felony Discharge of a Firearm or was a party to the predicate offense; and a person other than a party as defined in Utah Code Section 76-2-202 was killed in the course of the commission, attempted commission, or immediate flight from the commission or attempted commission of any predicate offense; and the actor acted with the intent required as an element of the predicate offense.
To wit: entry wounds marked F and H on autopsy examination.

COUNT 2
FELONY DISCHARGE OF FIREARM - SHOOT IN DIRECTION OF PERSON SERIOUS BODILY INJURY, 76-10-508.1(1)+(3), a First Degree Felony, as follows: That on or about May 26, 2024, at 1810 West Fortune Road in Salt Lake County, the defendant, as a party to the offense, did discharge a firearm in the direction of one or more individuals, knowing or having reason to believe that any individual may be endangered by the discharge of the firearm, and causes serious bodily injury to any individual.

COUNT 3
FELONY DISCHARGE OF FIREARM - SHOOT IN DIRECTION OF PERSON SERIOUS BODILY INJURY, 76-10-508.1(1)+(3), a First Degree Felony, as follows: That on or about May 26, 2024, at 1810 West Fortune Road in Salt Lake County, the defendant, as a party to the offense, did discharge a firearm in the direction of one or more individuals, knowing or having reason to believe that any individual may be endangered by the discharge of the firearm, and causes serious bodily injury to any individual.

COUNT 4
FELONY DISCHARGE OF FIREARM - SHOOT IN DIRECTION OF PERSON SERIOUS BODILY INJURY, 76-10-508.1(1)+(3), a First Degree Felony, as follows: That on or about May 26, 2024, at 1810 West Fortune Road in Salt Lake County, the defendant, as a party to the offense, did discharge a firearm in the direction of one or more individuals, knowing or having reason to believe that any individual may be endangered by the discharge of the firearm, and causes serious bodily injury to any individual.

COUNT 5
FELONY DISCHARGE OF FIREARM - SHOOT IN DIRECTION OF PERSON SERIOUS BODILY INJURY, 76-10-508.1(1)+(3), a First Degree Felony, as follows: That on or about May 26, 2024, at 1810 West Fortune Road in Salt Lake County, the defendant, as a party to the offense, did discharge a firearm in the direction of one or more individuals, knowing or having reason to believe that any individual may be endangered by the discharge of the firearm, and causes serious bodily injury to any individual.

COUNT 6
FELONY DISCHARGE OF FIREARM - SHOOT IN DIRECTION OF PERSON SERIOUS BODILY INJURY, 76-10-508.1(1)+(3), a First Degree Felony, as follows: That on or about May 26, 2024, at 1810 West Fortune Road in Salt Lake County, the defendant, as a party to the offense, did discharge a firearm in the direction of one or more individuals, knowing or having reason to believe

that any individual may be endangered by the discharge of the firearm, and causes serious bodily injury to any individual.

COUNT 7
FELONY DISCHARGE OF FIREARM - SHOOT IN DIRECTION OF PERSON SERIOUS BODILY INJURY, 76-10-508.1(1)+(3), a First Degree Felony, as follows: That on or about May 26, 2024, at 1810 West Fortune Road in Salt Lake County, the defendant, as a party to the offense, did discharge a firearm in the direction of one or more individuals, knowing or having reason to believe that any individual may be endangered by the discharge of the firearm, and causes serious bodily injury to any individual.

COUNT 8
FELONY DISCHARGE OF FIREARM - SHOOT IN DIRECTION OF PERSON SERIOUS BODILY INJURY, 76-10-508.1(1)+(3), a First Degree Felony, as follows: That on or about May 26, 2024, at 1810 West Fortune Road in Salt Lake County, the defendant, as a party to the offense, did discharge a firearm in the direction of one or more individuals, knowing or having reason to believe that any individual may be endangered by the discharge of the firearm, and causes serious bodily injury to any individual.

COUNT 9
FELONY DISCHARGE OF FIREARM - SHOOT IN DIRECTION OF PERSON SERIOUS BODILY INJURY, 76-10-508.1(1)+(3), a First Degree Felony, as follows: That on or about May 26, 2024, at 1810 West Fortune Road in Salt Lake County, the defendant, as a party to the offense, did discharge a firearm in the direction of one or more individuals, knowing or having reason to believe that any individual may be endangered by the discharge of the firearm, and causes serious bodily injury to any individual.

COUNT 10
FELONY DISCHARGE OF FIREARM - SHOOT IN DIRECTION OF PERSON SERIOUS BODILY INJURY, 76-10-508.1(1)+(3), a First Degree Felony, as follows: That on or about May 26, 2024, at 1810 West Fortune Road in Salt Lake County, the defendant, as a party to the offense, did discharge a firearm in the direction of one or more individuals, knowing or having reason to believe that any individual may be endangered by the discharge of the firearm, and causes serious bodily injury to any individual.

COUNT 11
FELONY DISCHARGE OF FIREARM - SHOOT IN DIRECTION OF PERSON SERIOUS BODILY INJURY, 76-10-508.1(1)+(3), a First Degree Felony, as follows: That on or about May 26, 2024, at 1810 West Fortune Road in Salt Lake County, the defendant, as a party to the offense, did discharge a firearm in the direction of one or more individuals, knowing or having reason to believe that any individual may be endangered by the discharge of the firearm, and causes serious bodily injury to any individual.

COUNT 12
FELONY DISCHARGE OF FIREARM - SHOOT IN DIRECTION OF PERSON SERIOUS BODILY INJURY, 76-10-508.1(1)+(3), a First Degree Felony, as follows: That on or about May 26, 2024, at 1810 West Fortune Road in Salt Lake County, the defendant, as a party to the offense, did discharge a firearm in the direction of one or more individuals, knowing or having reason to believe that any individual may be endangered by the discharge of the firearm, and causes serious bodily injury to any individual.

COUNT 13
FELONY DISCHARGE OF FIREARM - SHOOT IN DIRECTION OF PERSON SERIOUS BODILY INJURY, 76-10-508.1(1)+(3), a First Degree Felony, as follows: That on or about May 26, 2024, at 1810 West Fortune Road in Salt Lake County, the defendant, as a party to the offense, did discharge a firearm in the direction of one or more individuals, knowing or having reason to believe that any individual may be endangered by the discharge of the firearm, and causes serious bodily injury to any individual.

COUNT 14
FELONY DISCHARGE OF FIREARM - SHOOT IN DIRECTION OF PERSON SERIOUS BODILY INJURY, 76-10-508.1(1)+(3), a First Degree Felony, as follows: That on or about May 26, 2024, at 1810 West Fortune Road in Salt Lake County, the defendant, as a party to the offense, did discharge a firearm in the direction of one or more individuals, knowing or having reason to believe that any individual may be endangered by the discharge of the firearm, and causes serious bodily injury to any individual.

COUNT 15
OBSTRUCTION OF JUSTICE - CAPITAL/FIRST DEGREE FELONY CONDUCT, 76-8-306(2)+(3A), a Second Degree Felony, as follows: That on or about May 26, 2024, at 1810 W FORTUNE RD, in Salt Lake County, the defendant, as a party to the offense, did with intent to hinder, delay, or prevent the investigation, apprehension, prosecution, conviction, or punishment of any person regarding conduct that constitutes an offense that would be a capital felony or first degree felony:
(a) provide any person with a weapon;
(c) alter, destroy, conceal, or remove any item or other thing;
(d) make, present, or use any item or thing known by the actor to be false;
(f) provide a person with transportation, disguise, or other means of avoiding discovery or apprehension;
(3)(a) is a second degree felony if the conduct that constitutes an offense would be a capital felony or first degree felony.

THIS INFORMATION IS BASED ON EVIDENCE OBTAINED FROM THE FOLLOWING WITNESSES:

Detective B. Lynch, A.G., and N.C.

DECLARATION OF PROBABLE CAUSE:

Your Declarant bases the Information upon the following:

The statement of Detective Salt Lake City Police Detective B. Lynch that on May 26, 2024, officers responded to 1810 West Fortune Road in Salt Lake County to a shooting investigation at a warehouse after party. Upon arrival officers found a deceased male, later identified as Nico Patino, lying on the ground of the parking lot with multiple gunshot wounds. Investigators found expended 7.62mm, .40 caliber, and .45 caliber shell casings in the area of the shooting.

Detectives interviewed several witnesses including A.G. who stated that she and Nico had exited the warehouse and were standing in the parking lot when a silver Chrysler pulled up in front of them. Nico exchanged words with the driver, who grabbed something from his waist with his right hand and started shooting at Nico. Nico fell to the ground and A.G. attempted life saving efforts.

Detectives obtained video recordings from security cameras at the warehouse. From the recordings, detectives identified the shooters' vehicle as a silver Chrysler 200 with visible paint damage on the roof, no front license plate, and a tree-shaped air freshener hanging from the rearview miror. The vehicle first appeared in the video a few hours prior to the homicide. As the Chrysler entered the lot, the driver's blue top was visible through the window. After the vehicle parked, two males, later identified as ABDIHAKIM MOHAMED and NAY BLU SOE, exited the car and approached the warehouse on foot. They remained in the parking lot but never entered the warehouse. MOHAMED was wearing a green hoodie and pants with distinctive light and dark areas. SOE wore a blue hoodie, distincitive shoes, and eyeglasses.

The video also captured A.G. and Nico as they walked out of the warehouse to the parking area. A.G. and Nico stood near the first row of cars, as MOHAMED and a male who appeared to be wearing all black (hoodie, pants, and dark shoes) and a white facemask, quickly weaved through the park cars towards them. The Chrysler pulled up in front of Nico, who turned towards the driver's door. Seconds later, the video captured the sound of gunshots, and Nico fell to the ground. By this time, MOHAMED and the male in black had approached within feet of A.G. and Nico, and both shot at Nico. MOHAMED and the male ran to and entered the Chrysler, which immediately drove away.

Detectives obtained a recording of a barbecue that was held the night prior to the shooting. In the recording MOHAMED can be seen wearing the same distinct patterned pants and green hoodie consistent with the clothing worn in surveillance videos by one of the shooters.

Detectives interviewed witness N.C. who stated he was at the party that night and was approached by two males, one in a blue hoodie and one in a green hoodie. The males stated they were "trying to hit a lick". N.C. said the male in the green hoodie had a mini AK47 and the male in the blue hoodie had a handgun.

Search warrants were obtained for SOE's cellphone records. The records showed SOE's cellphone in the incident location at the time of the shooting. After the shooting, SOE's cellphone location moved Southbound on Redwood Road, then Westbound on State Route 201 before going up

and down Big Cottonwood Canyon which is consistent with surveillance of the suspect vehicle after the shooting.

Search warrants were obtained for MOHAMED's cellphone records, which showed MOHAMED's cellphone location near 1700 South and Redwood Road three minutes prior to the shooting. No cellphone data could be retrieved at the time of the shooting. However, just after the shooting, MOHAMED's cellphone location showed heading Westbound on State Route 201 before going up and down Big Cottonwood Canyon which is consistent with surveillance of the suspect vehicle after the shooting.

MOHAMED and SOE's cellphone data showed MOHAMED and SOE's cellphones traveling together.

A search warrant was obtained for SOE's place of residence. Detectives interviewed witness A.R. who stated SOE arrived home in a blue hoodie the morning of the shooting and was stressed out about shooting and killing some "big fat guy" in Glendale. Detectives recovered a blue hoodie from the residence.

A search warrant was obtained for a silver Chrysler 200 registered to MOHAMED's father. The vehicle had previously been identified through license plate reader records as having been in the area of the homicide. MOHAMED was documented as a frequent driver of the vehicle, and had recently had a police interaction involving the vehicle, on May 16, 2024. The Chrysler 200 had roof paint damage consistent with that observed in the security video, no front plate, and (at the time of the May 16 interaction) tree air fresheners hanging from the rearview. During the search, detectives recovered several items of evidence including a shell casing from the exterior windshield, a Glock magazine, and a fired bullet from the driver side door pocket.

Post-Miranda MOHAMED admitted that he drives the silver Chrysler.

Detectives obtained surveillance and record of SOE at the Salt Lake City International Airport on June 16, 2024, leaving on a flight wearing the same shoes he had on in the surveillance videos the night of the shooting. Airport surveillance shows SOE returning days later to Salt Lake City International Airport in a pair of sandals.

Dr. Lohman with the Officer of the Medical Examiner conducted the autopsy of Nico. Dr. Lohman located seven entry gunshot wounds in his back and eight entry gunshot wounds in his front. Two of the gunshot wounds would have been fatal. One entered Nico's body on the back right side and struck his lung and his heart. The second entered the right side of Nico's back and hit his liver. Dr. Lohman determined that the cause of death was homicide due to multiple gunshot wounds.

REQUEST FOR ISSUANCE OF A WARRANT:

Pursuant to Utah Code 77-20-201(1) the State requests that the defendant be held without bail until further notice in this matter on the following grounds:

The defendant is charged with murder and other multiple felonies and based upon the

above probable cause statement, there is substantial evidence supporting the charges and clear and convincing evidence that the defendant would constitute a substantial danger to any other individual or to the community or is likely to flee the jurisdiction of the court, if released on bail.

In this case, the defendant fired multiple shots at the victim in a parking lot where multiple people were standing and could have been injured. The defendant then fled the scene and the firearms in this case have not been recovered. The investigation is ongoing with additional suspects outstanding. The release of the defendant would jeopardize the ongoing investigation and witnesses in this case.

The defendant is a danger to the community and those around him. The defendant fired multiple shots in a parking lot with multiple by standers then fled the scene. The firearms were not recovered. Due to the serious nature of the allegations, and his immediate flight after the incident, the defendant should be held without bail.

Pursuant to Utah Code Annotated § 78B-18a-106 (2018) I declare under criminal penalty of the State of Utah that the foregoing is true and correct to the best of my belief and knowledge.

Executed on: 27th day of June, 2024

/s/ BRANDON L. LYNCH
Declarant

Authorized for presentment and filing

SIM GILL, District Attorney

/s/ Clint Heiner
Deputy District Attorney
27th day of June, 2024
CH / NC / DAO # 24.011174

OTHER PENDING CASES FOR THE DEFENDANT

Court	Court Case #	Trial Judge	DAO #	Charge
Third District Court, SALT LAKE DEPARTMENT			24.010973	Count 1 76-5-202 AGGRAVATED MURDER (First Degree Felony) Count 15 76-8-306(2)+(3A) OBSTRUCTION OF JUSTICE - CAPI... (Second Degree Felony) Count 2 76-10-508.1(1)+(3) FELONY DISCHARGE OF FIREARM -... (First Degree Felony) Count 3 76-10-508.1(1)+(3) FELONY DISCHARGE OF FIREARM -... (First Degree Felony) Count 4 76-10-508.1(1)+(3) FELONY DISCHARGE OF FIREARM -... (First Degree Felony) Count 5 76-10-508.1(1)+(3) FELONY DISCHARGE OF FIREARM -... (First Degree Felony) Count 6 76-10-508.1(1)+(3) FELONY DISCHARGE OF FIREARM -... (First Degree Felony) Count 7 76-10-508.1(1)+(3) FELONY DISCHARGE OF FIREARM -... (First Degree Felony) Count 8 76-10-508.1(1)+(3) FELONY DISCHARGE OF FIREARM -... (First Degree Felony) Count 9 76-10-508.1(1)+(3) FELONY DISCHARGE OF FIREARM -... (First Degree Felony) Count 10 76-10-508.1(1)+(3) FELONY DISCHARGE OF FIREARM -... (First Degree Felony) Count 11 76-10-508.1(1)+(3) FELONY DISCHARGE OF

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				FIREARM -... (First Degree Felony) Count 12 76-10-508.1(1)+(3) FELONY DISCHARGE OF FIREARM -... (First Degree Felony) Count 13 76-10-508.1(1)+(3) FELONY DISCHARGE OF FIREARM -... (First Degree Felony) Count 14 76-10-508.1(1)+(3) FELONY DISCHARGE OF FIREARM -... (First Degree Felony)